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October 18, 2012

**VIA FACSIMILE AND ECF**

Honorable Cheryl L. Pollak  
United States Magistrate Judge  
United States Courthouse  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Ambrose v. The Mount Sinai Hospital, et al.  
11 Civ. 2026 (KAM) (CLP)

Dear Judge Pollak:

On behalf of our clients, The Mount Sinai Hospital and Maxine Shepherd, and after consultation with counsel for the Plaintiff, Alberto Ambrose, the parties request an adjournment of the deadline to exchange written responses to discovery demands from October 19 to November 9, 2012. Both parties are in the process of gathering documents and information and determining whether it will be necessary to enter into a confidentiality stipulation prior to the exchange of documents. After the parties exchange written responses, the parties will conduct depositions in the manner discussed at the conference held on September 20, 2012.

Respectfully submitted,



Rory J. McEvoy

cc: Ian F. Wallace (via facsimile)  
Attorney for Plaintiff